

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In Re: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

CASE NO: 2:15-MD-02641-DGC
MDL No. 2641

This Document Relates to:
2:16-cv-00890-DGC
Steven Bushman vs. Bard, et al.

UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT

Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure, moves this Court for an order amending the Complaint.

1. Plaintiff seeks leave to file the attached short form complaint to correct Paragraph 2 and add Plaintiff's spouse and add to Paragraph 12, Count XV the loss of consortium claim, (see Amended Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial).
2. Plaintiff's counsel has conferred with Defendants' counsel and Defendants do not oppose the filing of this motion.

Based on the foregoing, Steven Bushman requests that this Court grant this request to add the Plaintiff's spouse to Paragraph 2, and direct the Clerk to file the attached Amended Second Amended Master Short Form Complaint.

Dated: September 29, 2016

/s/ Joseph R. Johnson
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of September, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Joseph R. Johnson _____